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BY ECF

October 17, 2025

The Honorable Lee G. Dunst
Magistrate Judge, United States District Court, EDNY
Alphonse M. D'Amato Federal Building
100 Federal Plaza
Central Islip, NY 11722-4454

Re: Hasper v. County of Nassau, et. al.
United States District Court, EDNY
2:20 CV 2349 (RER) (LGD)

Dear Magistrate Judge Dunst:

Kindly accept this joint status report regarding the above matter.

Since the parties' last status report, the County hired John McEntee, Esq. and Katy Cole, Esq. of Greenberg Traurig, LLP ("GT"), as counsel for defendants. Going forward, GT will assume full representation of all defendants in this matter.

Defendant Russell's subpoenaed Verizon cell phone records have recently been received. The parties had agreed that Russell's deposition would take place on November 21, 2025, subject to the Court's approval, due to a trial I was to start this Wednesday, October 22, 2025 before Magistrate Wicks. I learned earlier today the trial was adjourned due to the government shutdown. Subject to the Court's approval, the parties will now endeavor to complete Russell's deposition as soon as possible, but no later than November 21, 2025.

The parties have also agreed, subject to the Court's approval, to extend the deadline for the parties to exchange various items of discovery, including (I) responses to outstanding Interrogatories and Requests for Discovery and Inspection, (ii) copies of deposition transcripts of witnesses deposed along with the video recordings for all depositions taken by Plaintiff, and (iii) copies of deposition exhibits for all completed depositions.

The parties therefore request that the discovery deadlines herein be extended forty-five (45) days.

Kindly advise the parties if this proposed schedule is acceptable and if you need anything further.

Thank you.

Respectfully submitted,



ANTHONY M. LA PINTA

cc: John McEntee, Esq.
Katy Cole, Esq.
William Hasper